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Federal Communications Commission
Office of the Secretary



Common Ground Alliance

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December 12, 2005

Federal Communications Commission
Kevin Martin
445 12th Street S.W.
Washington, D.C 20554

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92-103

Dear Commissioner Martin:

The Common Ground Alliance's One Call Systems International Committee (CGA-OCSI) supports the 8-1-1 Order as issued by the Federal Communications Commission (FCC) pursuant to the earlier mandate of Pipeline Safety Improvement Act of 2002 as a means of enhancing underground damage prevention and, ultimately, public safety. Nationally, the CGA estimates that, in 40% of total underground facility damages, no notification was made to the one call center prior to excavation. This order will increase the opportunity for all excavators that include utility companies, homeowners, landscapers and others to communicate with one call centers in a simple, easily accomplished fashion, much the same as 9-1-1 is used for notifying emergency response personnel.

CGA-OCSI understands that technical and operational issues for implementation of 8-1-1 were left to the States pursuant to the Order. However, following ongoing discussions among CGA-OCSI members, we are concerned as to how the issue of cost recovery will be considered by telecommunication providers and the State Public Service/Public Utility Commissions throughout the nation. Some telecommunications providers propose no recovery of costs, some propose recovery of direct actual costs only, and some have included a component for recurring charges. CGA-OCSI urges the Commissions to resolve these conversion issues in a reasonable and timely manner.

Respectfully,

RR Kipp

Robert Kipp
CGA President

Paul Preketes

Paul Preketes
CGA Chairman

cc: Common Ground Alliance Board of Directors
One Call Systems International (OCSI) Committee Members

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